Case: 1:10-cv-02750 Document #: 66 Filed: 02/24/11 Page 1 of 2 PageID #:215

Case: 1:10-cv-02750 Document #: 61-1 Filed: 02/16/11 Page 2 of 3 PageID #:208

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

PEDRO RANGEL, and PEDRO RANGEL, JR., Plaintiffs,

v.

CITY OF CHICAGO, CHICAGO POLICE OFFICERS N. CHAPELLO, M. GONZALEZ, M. MATKER, C. POKOJOWCZYK, J. WASHKEVICH, M. WALTON and R. LESLIE FIORITO,

Defendants.

No. 10 C 2750

Judge Joan H. Lefkow

## **PROTECTIVE ORDER**

THIS CAUSE COMING on to be heard on the Motion of Defendants, City of Chicago and Chicago Police Officers N. Chapello, M. Gonzalez, M. Matker, C. Pokojowczyk, J. Washkevich, M. Walton and R. Leslie Fiorito, IT IS HEREBY ORDERED:

That the Defendants' Motion for Protective Order be and hereby is allowed. The terms and conditions of this Protective Order are to be as follows:

- 1. This Protective Order shall govern all documents and other discovery materials produced concerning juvenile records of Pedro Rangel Jr., Santiago Rangel, and David Vaca.
- 2. Juvenile records shall fall under the definitions and terms set forth in 705 ILCS 405/.
- 3. The above described documentation is deemed "protected information" pursuant to this Protective Order.
- 4. Protected information shall be used by the Parties solely for the preparation and litigation of the captioned litigation and shall not be used in any other activity, nor given, shown, made available, discussed or otherwise communicated to anyone for any other purpose.

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Case: 1:10-cv-02750 Document #: 66 Filed: 02/24/11 Page 2 of 2 PageID #:216

Case: 1:10-cv-02750 Document #: 61-1 Filed: 02/16/11 Page 3 of 3 PageID #:209

5. The Parties shall bring this Protective Order to the attention of all persons to

whom protected information is disclosed. The Parties shall also obtain a signed agreement from

all such persons to abide by the terms of this Protective Order prior to disclosing protected

information.

6. Any documents produced pursuant to this Protective Order shall also be

designated as confidential under the Qualified HIPAA and Confidential Matter Protective Order

entered in this matter on October 25, 2010.

7. Document production falling under the guise of this Protective Order shall also

comply with the Qualified HIPAA and Confidential Matter Protective Order entered in this

matter on October 25, 2010.

8. That neither the taking of any action in accordance with the provisions of the

Protective Order entered herein, nor the failure to object thereto, shall be construed as a waiver

of any claim or defense in this action. Further, the entry of this Order shall not be construed as a

waiver of any right to object to the furnishing of information in response to discovery and, as

expressly provided, shall not relieve any party of the obligation of producing information in the

course of discovery. Further, neither the taking of any action in accordance with the provisions

of this Protective Order entered herein, nor the failure to object thereto, shall constitute a waiver

of objections as to the admissibility of the protected information described herein.

9. Upon motion of any party for good cause shown, the Court may modify the terms

of this Protective Order.

Dated: 2-24-11

Judge Horn